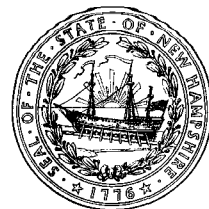




The State of New Hampshire  
**Department of Environmental Services**



Michael P. Nolin  
Commissioner

**LETTER OF DEFICIENCY**  
**WD WWEB/C 06-01**

February 28, 2006

Lorna Aldrich  
Town Administrator  
Town of Northumberland  
3 State Street  
Groveton, New Hampshire 03582

Subject: National Pollutant Discharge Elimination System (NPDES) Compliance  
Inspection at Northumberland Wastewater Treatment Facility, Northumberland,  
NH - NPDES Permit # NH0101206

Dear Ms. Aldrich:

On February 7, 2006, as a representative of the Department of Environmental Services (DES) Wastewater Engineering Bureau, I conducted an NPDES Compliance Sampling Inspection (CSI) at Northumberland Wastewater Treatment Facility (Northumberland). Objectives of a CSI included determining compliance with NPDES permit conditions, verifying the accuracy of permit-required information and verifying the adequacy of permittee sampling and monitoring.

The following people were present during this CSI:

Richard Marshall, Chief Operator, Northumberland  
Travis Wentworth, Operator, Northumberland  
Roy D. Gilbreth, Environmental Inspector, DES

**DEFICIENCIES: (response required)**

During the inspection I noted the following deficiencies:

1. For the past six months, the pH electrode storage liquid has not been changed. In accordance with manufacturer's recommendations (see page 35 of your electrode manual), the pH electrode must be stored in Hach electrode storage solution, and the storage solution must be replaced at least once a month.
2. According to your pH electrode manual (see page 10), the electrode must be primed daily by pumping Potassium Chloride Electrolyte Gel into the electrode. Since being placed in service six months ago, priming of the

electrode has not been done. The electrode must be primed daily by pumping Potassium Chloride Electrolyte Gel into the electrode.

3. The total coliform alternative enrichment technique test method on your contract laboratory bench sheet is incorrect. The test method for total coliform using the alternative enrichment technique for Standard Methods 20<sup>th</sup> Edition is 9222(B+B.5d), not 9222(B+B.5c). The contract laboratory total coliform bench sheets must be corrected to reflect the correct test method.

**REPEAT DEFICIENCIES (Noted in May 19, 2005 NPDES inspection – response required) If these repeat deficiencies are noted in any subsequent inspection then DES may proceed immediately with formal enforcement action which may include an administrative fine.**

1. Presently, the pH meter is calibrated with pH buffers 8 and 10, and checked with a buffer 7 standard. The pH meter must be calibrated with pH buffers 7 and 10, and checked with a buffer 8 standard. This procedure must also be noted in your laboratory Quality Assurance Manual (QAM).

**RECOMMENDATIONS/OBSERVATIONS: (No response required)**

1. Food is stored in the laboratory refrigerator. Storing food here may present a health hazard for employees.
2. DES recommends that Northumberland date all reagents with the date received and date opened. This will make inventory tracking easier and prevent the use of expired reagents.
3. Because there is no potable water at the wastewater plant, dirty laboratory glassware must be taken to the town shed (approximately four miles away) for cleaning. This is inefficient and makes it less likely glassware will be cleaned properly. Potable water, including hot water and if possible a bathroom, should be installed at the plant.

**CORRECTIVE ACTIONS REQUIRED:**

DES requests that Northumberland describe all steps taken to correct the deficiencies identified by the inspector. This description should also include the dates the deficiencies were corrected or the anticipated correction date. If the submitted response is acceptable to DES and the deficiencies are not repeat deficiencies and/or have not resulted in environmental harm, DES will close out the inspection and no further action, other than continued compliance, is required by the permittee. If DES identifies repeat deficiencies or deficiencies that result in environmental harm in this or future inspections, DES may proceed immediately with enforcement.

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DES requests that you submit your response to this inspection by **March 28, 2006**. If DES does not receive a signed, complete response within the allowed time frame, DES may proceed with an appropriate enforcement action.

Please mail your inspection response to:

Roy D. Gilbreth  
NHDES/WD-WWEB  
P.O. Box 95  
Concord, NH 03302-0095

Enclosed is a copy of EPA Form 3560 – Water Compliance Inspection Report. Analytical results for samples taken on January 26, 2006 were hand-delivered during the inspection. Test results indicate all sample results are within acceptable range. If you have any questions concerning the inspection, please call Roy Gilbreth at 271-1494.

Sincerely,



John R. Bush, P.E.  
Administrator  
Wastewater Engineering Bureau

cc: DES, WD, WWEB/File  
Richard Marshall, Chief Operator, Northumberland WWTP  
Roy D. Gilbreth, Environmental Inspector, WWEB  
Margaret Bastien, P.E., WWEB  
Gretchen Hamel, Enforcement Coordinator, DES  
Joy Hilton, USEPA Water Technical Unit

Attachment: EPA Form 3560 – Water Compliance Inspection Report

CERTIFIED MAIL/RRR: 7099 3400 0018 1294 3837